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June 20, 2024

VIA ECF

The Honorable Jesse M. Furman United States District Judge Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Reclaim the Records and Alec Ferretti v. United States Department of State, No. 23 Civ. 1471 (JMF)

Your Honor:

I am Of Counsel to Beldock Levine & Hoffman LLP, representing Plaintiffs in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"). I write to respectfully request a 7-day extension of the June 26, 2024 deadline for Plaintiffs' reply to Defendant's Reply Memorandum of Law in Further Support of Defendant's Motion for Summary Judgment and In Opposition to Plaintiffs' Cross-Motion for Summary Judgment. Under the revised briefing schedule, Plaintiffs' reply brief would be due July 3, 2024. Defendant consents to this request.

This is the fourth request by Plaintiffs for an extension of the briefing schedule. The previous requests, dated November 27, 2023, December 15, 2023, and February 1, 2023, were all granted. Additionally, on March 20, 2024 the Court granted Plaintiffs' request to file an amended Memorandum of Law in Opposition incorporating an expert declaration, which also extended the briefing schedule.

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The reason for this request is that for approximately two weeks, unanticipated health issues have caused considerable reduction of my work capacity, including my responsibilities regarding the instant reply brief.

We thank the Court for its attention to this matter.

Respectfully submitted,

Benjamin Meyers

cc: Defendant's counsel (by ECF)

Application GRANTED. Further extensions are unikely to be granted. The Clerk of Court is directed to terminate ECF No. 48.

SO ORDERED.

June 20, 2024